



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COLUMBIA ENVIRONMENTAL FIELD OFFICE

1421 HAMPSHIRE PIKE
COLUMBIA, TENNESSEE 38401
PHONE (931) 380-3371 STATEWIDE 1-888-891-8332 FAX (931) 380-3397

April 11, 2016

The Honorable Joyce Brown
City Mayor
City of Cowan
P.O. Box 338
Cowan, TN 37318

Re: Compliance Evaluation Inspection
 City of Cowan STP
 NPDES Permit No. TN0021644
 Cowan, Franklin County, Tennessee

Dear Mayor Brown:

On April 1, 2016, I conducted a Compliance Evaluation Inspection (CEI) at the City of Cowan Wastewater Treatment Plant. A CEI is conducted to determine compliance with the NPDES permit and to check the operation and maintenance of the equipment used in determining compliance with the permit. The following observations were made during the inspection:

1. The current permit became effective on March 1, 2013 and shall expire on January 31, 2017.
2. Mr. Tommy Myers, who has a Grade IV wastewater plant operator and a Grade I collections license is currently in direct charge of the wastewater treatment plant.
3. The STP does not allow any pump and haulers to discharge into their facility.
4. New influent and effluent composite samplers set for flow proportional collection were in use during inspection. Each sampler is equipped with a sealed thermometer, calibrated by Labtronix.
5. WWTP upgrades have been completed since the previous inspection. A new headworks channel, new static screen and other appurtenances for collecting and removing debris from incoming wastewater flow has been installed. A new influent flow measuring device and two new submersible pumps have been installed on the influent headworks. A spare influent pump is on site

6. Repairs and upgrades were made to the existing clarifiers at the treatment plant. Each clarifier was equipped with a new drive assembly, sludge scraper, weir trough, effluent pipe, curved influent trough, skirt assembly, hinged race skimmer and sludge pipe assembly.
7. The plant is equipped with an emergency generator in the event of a power failure. The generator is tested weekly and recorded in a log book.
8. A review of the Discharge Monitoring Reports (DMR's) submitted to this office since the previous inspection was performed. The review indicated that there had been one permit exceedance during the reporting period. The Ammonia Total Nitrogen (as N) weekly average lb/d value reported during December 2015 was 11.3, the permit limit is 10.
9. E. Coli is being reported as a geometric mean on the Discharge Monitoring Report (DMR). Mixed Liquor Suspended Solids (MLSS) tests are being performed at least three times per week with the results being reported on the back of the Monthly Operation Report (MOR).
9. The laboratory is equipped to perform the analytical testing requirements of the permit. The following new laboratory equipment has been purchased since the previous inspection: IDEXX-Plus Quanti-Tray for E. Coli, Hach HQ40D Dissolved Oxygen (DO) meter, new instrument scale and weights, Thermo-Scientific pH meter. Laboratory was calibrated by Labtronix on December 7, 2015. Bench sheets for each monitoring parameter were available for review. Outdated chemicals have been removed from the laboratory and properly disposed of.
10. Quarterly calibration of the influent and effluent flow meters is being performed and documented in a log book.
11. A QA/QC program is being implemented by the operator and employees are being trained.
12. A Standard Operating Procedures (SOP) for the laboratory and treatment plant has been developed and signed off by all applicable personnel in February 2016.
13. A log book for plant maintenance and repairs is maintained on site.
14. Sludge drying beds were in use during the inspection. The current accumulation of dried sludge needs to be removed from the site.
15. Vegetation has been cleared around the perimeter fence and repairs made to any area requiring attention.
16. The city is working with their engineer to develop and implement a plan to address inflow and infiltration within the collection system. The city repaired twelve (12) service lines during 2015. There have been no overflows reported within the collection system since the previous inspection.

17. The effluent being discharged to Boiling Fork Creek on the day of the inspection was clear. The outfall is posted with the sign requirements of the permit.

The division acknowledges the efforts that the City of Cowan has shown to protect and improve water quality. The wastewater treatment plant upgrades and improvements completed in 2015, along with the current certified operator and staff, demonstrate the continued efforts being made by the City of Cowan to improve operations at the wastewater treatment plant.

This concludes my observations. I would like to thank you, Mr. Myers, Mr. Henshaw, Mr. Willis and Mr. Stephens for your time and cooperation during the inspection. If you have any questions you may reach me at 1-931-840-4166 or by e-mail at gary.horne@tn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gary Horne', is written over a light blue circular stamp.

Gary Horne
Division of Water Resources



ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TN0021644	Facility Site Name	City of Cowan STP		
		Address	300 Looney St. Cowan, TN 37318		
Permit Eff. Date:	Mar 1, 2013	Permit Exp Date:	Jan 31, 2017	SIC Code:	

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity	Evaluation				

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	04/01/2016 10:00	Exit Date/Time (mm/dd/yyyy hh:mm):	04/01/2015 11:45
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Facility Representatives

Tommy Myers, WWTP Operator, 931-703-3300	Honorable Joyce Brown, Mayor, 931-967-7318
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)		

Compliance Monitoring Reason:	Core Program		
Compliance Monitoring Agency Type:		Agency Name:	TDEC - DWR
Did EPA assist/ Inspection?	No	Time Physically conducting activity: Days:	Hours: 2
Inspection Type:	State	Compliance Monitoring Action Outcome:	No Violation
Lead Agency:	State	Compliance Monitoring Rating Code:	Unrated
If Joint Inspection, what was the purpose of the other party?			

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Combined Sewer Overflow
<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling / Disposal	<input checked="" type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

upgrades and improvements completed at plant in 2015.

EPA and State Representatives

	TDEC-DWR/ Columbia EFO / 931-840-4166	4/13/16
Inspector's Signature	Agency / Office / Phone	Date
	TDEC-DWR/ Columbia EFO / 931-840-4153	4/13/16
Manager's Signature	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)